

January 24, 2025

BY ECF

The Honorable Lewis A. Kaplan
 United States District Judge
 500 Pearl Street
 New York, NY 10007

Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08810 (LAK)

Dear Judge Kaplan:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") and defendant Bad Boy Records, LLC.

The undersigned parties respectfully request that the initial scheduling conference in this matter currently scheduled for February 3, 2025, be adjourned pending resolution of Defendants' anticipated motions to dismiss. Per the stipulated deadline approved in the Court's prior order (ECF #18), Defendants intend to file a motion to dismiss the Complaint on or before February 25, 2025.

We believe that such an adjournment would be consistent with Your Honor's individual rules, which provide that: "Unless the parties are otherwise notified, a pending motion to dismiss the entire action cancels any previously scheduled initial scheduling conference."

Plaintiff made one prior request to adjourn this conference on the ground that service had not been completed (ECF #11), which resulted in a rescheduling from January 6, 2025 to February 3, 2025.

Respectfully submitted,

/s/ Mark Cuccaro

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